

JESS R. MARCHESE, ESQ.

Nevada State Bar #8175

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Attorney for Defendant RODRIGUEZ-PEREZ

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THE UNITED STATES OF AMERICA,

CASE NO: 2:15-CR-320-KJD-PAL

Plaintiff,

v.

OMAR RODRIGUEZ-PEREZ,

Defendant.

UNOPPOSED MOTION FOR PRE PLEA PRESENTENCE INVESTIGATION REPORT

COMES NOW, JESS R. MARCHESE, ESQ., and hereby moves for or Order directing Probation to perform a pre-plea PSR for the Defendant in this case. This Motion is made and based upon the attached Points and Authorities, Declaration of Counsel, and any argument entertained at the hearing on this matter.

DATED this 30th day of November, 2017.

MARCHESE LAW OFFICES

JESS R. MARCHESE ESQ.

Nevada Bar No. 8175

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Attorney for Defendant

POINTS AND AUTHORITIES

Recently, the undersigned received a written plea offer from the United States of America. In order to properly counsel the defendant in reference to this plea, counsel would request that this Court order a Pre-Plea Presentence Investigation Report for Mr. Rodriguez-Perez.

Specifically, counsel is concerned that due to previous traffic arrests that Mr. Rodriguez-Perez may have criminal history points that might cause him to be ineligible for the safety valve and/or have an increased criminal history category. Out of an abundance of caution, counsel would like the report done.

In addition, the undersigned has spoken with counsel for the United States of America and he does not oppose this request.


DATED this 30th day of November, 2017.

MARCHESE LAW OFFICES

/s/

JESS R. MARCHESE, ESQ.
Nevada Bar No. 8175
601 S. Las Vegas Blvd.
Las Vegas, Nevada 89101

IT IS SO ORDERED this 1st day
of December, 2017.


Peggy A. Leen
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing MOTION FOR PRE-PLEA PSR via electronic filing system (ECF) on the 30th day of November, 2017 to the following registered recipients:

Mr. Robert Knief, Esq.
Counsel for United States of America

_____/s/_____
Employee of Marchese Law Offices